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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Ray William Abelia ,	)	Case No. 2:23-cv-01224-AC
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del>
vs.	)	ORDER FOR EXTENSION OF
	)	TIME
Kilolo Kijakazi, Acting	)	
Commissioner of Social Security,	)	
Defendant.	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from September 26, 2023 to November 27, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of September 18, 2023 and September 25, 2023,  
2 Counsel currently has 11 merit briefs, and several letter briefs and reply briefs.  
3 This matter has recently been reassigned and Plaintiff's Counsel requires  
4 additional time to brief the issues thoroughly for the Court's consideration.  
5 Defendant does not oppose the requested extension. Counsel apologizes to the  
6 Defendant and Court for any inconvenience this may cause.

7  
8 Respectfully submitted,

9 Dated: September 6, 2023 PENA & BROMBERG, ATTORNEYS AT LAW  
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11 By: /s/ Dolly M. Trompeter  
12 DOLLY M. TROMPETER  
13 Attorneys for Plaintiff  
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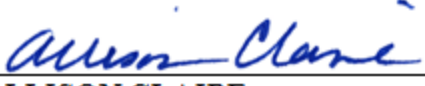
15 Dated: September 6, 2023 PHILLIP A. TALBERT  
16 United States Attorney  
17 PETER K. THOMPSON  
18 Acting Regional Chief Counsel, Region IX  
19 Social Security Administration

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21 By: \*s/ Oscar Gonzalez de Llano  
22 Oscar Gonzalez de Llano  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on September 6, 2023)  
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**ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

DATED: September 7, 2023.

  
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ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE